

Message

From: Matthew E. Cohn [mcohn@greensfelder.com]
Sent: 7/5/2018 5:39:21 PM
To: Stillman, Sarah [Stillman.Sarah@epa.gov]
Subject: RE: USG - Red Wing, Minnesota

Dear Sarah,

I have been in touch with USG's modeling consultants, and I am providing the response to your email below.

As described in the protocol document, "As part of the Phase 2 modeling, USG may need to undertake iterative analyses to investigate different facility configurations, operation conditions, and emission limits." Ultimately, USG will be unable to complete these analyses until we receive approval from EPA on the modeling protocol and its methods.

Nevertheless, we would be happy to have further discussions with EPA regarding approval of the protocol and its contents. EPA's internal discussions regarding protocol approval may be enhanced by further conversations with the USG modeling team regarding the specific details of the protocol. In our experience, some questions may arise that can be addressed with a simple dialogue to avoid a lengthy comment and response process.

At this time, we do not know the length of time necessary for the Phase 2 analyses. The length of time will inevitably depend on:

- (1) the time of approval of the protocol,
- (2) development of any potential emission limits and/or operational/physical changes that may need to be considered by USG, and
- (3) the potential need for coordination with MPCA on any possible future permit changes or other enforceable requirements (e.g., Administrative Order).

Ultimately, the next step in completion of the Phase 2 modeling is approval of the protocol. After approval, we will be in a much better position to discuss the timeline for completion of the Phase 2 modeling.

Thank you for your response and please let me know if the EPA protocol review team has any questions. I would be happy to help coordinate dialogue between the EPA's modelers reviewing the protocol and our modelers who prepared it.

Regards,

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From: Stillman, Sarah [mailto:Stillman.Sarah@epa.gov]
Sent: Monday, July 02, 2018 3:05 PM
To: Matthew E. Cohn
Subject: RE: USG - Red Wing, Minnesota

Dear Matt,

Thank you again for your May 24, 2018 submittal on behalf of USG Interior Inc. We are still reviewing the information you provided and we are also consulting the air quality modeling group at OAQPS.

Based on your cover letter, we understand that you are continuing to complete phase 2 of the modeling protocol and that you will share the results with EPA and MPCA. Could you please let me know what is your timetable for completion?

Best regards,

Sarah J. Stillman
Office of Regional Counsel
U.S. EPA Region 5
(312) 886-3611
stillman.sarah@epa.gov

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From: Stillman, Sarah
Sent: Wednesday, June 06, 2018 4:19 PM
To: 'Matthew E. Cohn' <mcohn@greensfelder.com>
Subject: RE: USG - Red Wing, Minnesota

Thank you Matt.

We are reviewing your submittal and I will let you know when we are ready to talk.

Sincerely,

- Sarah

Sarah J. Stillman
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U.S. EPA Region 5
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From: Matthew E. Cohn [<mailto:mcohn@greensfelder.com>]
Sent: Thursday, May 24, 2018 4:13 PM
To: Stillman, Sarah <Stillman.Sarah@epa.gov>
Cc: Schaufelberger, Daniel <schaufelberger.daniel@epa.gov>; Robinson, Randall <robinson.randall@epa.gov>; MHill@usg.com; Cory Boeck <cory.boeck@state.mn.us>; Hindi, Nizar (<NHindi@usg.com> <NHindi@usg.com>); JBennett@barr.com; Robert Paine <bob.paine@aecom.com>; Haney, Paul <phaney@usg.com>
Subject: USG - Red Wing, Minnesota

MULTIPLE RECIPIENTS, DO NOT "REPLY ALL"

Dear Ms. Stillman:

Responding to your letter dated April 3, 2018, and following up on our meeting of January 11, 2018, please find the attached letter from me along with a Modeling Protocol prepared by Barr Engineering. I have copied on this email your modeling staff Daniel Schaufelberger and Randall Robinson, as well as Corey Boeck from the MPCA, USG's environmental consultants, and USG's plant and environmental management staff. A paper copy of the attached letter and the Modeling Protocol are also being delivered to your office.

I have also been asked to share the following note for your modelers:

Please note that the modeling protocol submittal does not contain supporting files. The size of many of these files precludes their submittal as part of this package. In addition, the UMORE Park meteorological data used as part of USG's modeling is not publically available and some additional arrangements will be needed to provide this information. USG encourages EPA modeling staff to reach out to Jeff Bennett, Barr Engineering, at (573) 638-5033 or jbennett@barr.com to request the supporting files for the modeling analyses and/or the Phase 1 modeling input/outputs and make the necessary arrangements for the meteorological information.

Please do not hesitate to contact me to discuss anything. I look forward to hearing from you after EPA has the opportunity to consider this submittal.

Respectfully yours,

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